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March 24, 2025

BY ECF

U.S. Mag. Judge (unassigned)
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *U.S. v. Lakmichand Lohani*, 25 MJ 802 (SDNY) (unassigned)

Dear. Hon. Mag. Judge,

I represent Lohani and write seeking a consent extension of time to post real property to secure pre-trial release.

On March 18, 2025, Hon. Katharine H. Parker released Lohani on a \$750,000 bond. ECF No. 9. Conditions include travel restrictions and standalone GPS monitoring. *Id.* On March 19 Lohani surrendered his passport to U.S. pretrial services. On March 21 two sureties executed the bond following government interview and approval.

March 25 is the deadline to encumber two properties in Morris Co., New Jersey, to secure the bond. *Id.* Numerous calls to that local court and clerk's office reveal the process to be unusually byzantine, requiring additional time. Counsel conferred with the government who consents to a two-week extension.

Thus, counsel respectfully seeks a bond modification permitting remaining conditions to be met by April 8, 2025.

Respectfully,

/S/ Robert Caliendo

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Cc: AUSA Remy Grosbard (ECF)